

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

In re: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

THIS DOCUMENT RELATES TO:

*United States of America ex rel. Ven-a-Care of the
Florida Keys, Inc., v. Abbott Laboratories, Inc.*

CIVIL ACTION NO. 06-11337-PBS

MDL No. 1456
Civil Action No. 01-12257-PBS

Hon. Patti Saris

**ABBOTT LABORATORIES, INC.'S SECOND AMENDED RESPONSES TO THE
UNITED STATES' FIRST SET OF INTERROGATORIES**

Defendants Abbott Laboratories, Inc. ("Abbott") amends its responses to Plaintiff, the United States' ("Plaintiff") First Set of Interrogatories ("Interrogatories") as follows:

SECOND AMENDED RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 8: Identify all of Your employees who were involved in the sales of the Pharmaceuticals identified in the complaint and the dates of their employment by You, including their positions at Abbott and any related organizational charts.

RESPONSE: Abbott incorporates its general and specific objections to its Responses to Plaintiffs' First Set of Interrogatories and its Amended Responses to Plaintiffs' First Set of Interrogatories herein. Subject to and without waiving its objections, Abbott states that in addition to those individuals named in its Amended Responses to Plaintiffs' First Set of Interrogatories, the following individuals worked for some period of time during 1991 - 2003 in the Hospital Products Division ("HPD") Alternate Site Product Sales and were responsible for sales of products including the Subject Drugs. The employment dates provided indicate the entire time that these individuals were employed by Abbott, not necessarily the time they spent in Alternate Site Sales.

Last Name	First Name	MI	Start Date	End Date	Final Job Title at Abbott
Stewart	Antoinette		08/15/88	1999	Infusion Sys Spec
Thiel	Margo	L	06/30/97	1999	Infusion Sys Spec
Gardner	William	C	06/03/96	2000	Infusion Sys Spec
Pyfer	Paul	A	07/23/97	2000	Pain Specialist
Bobnar	Sharon	D	09/05/89	1998	Infusion Sys Spec
Lotz	William	G	01/31/94	2001	Pricing Specialist
Murphy	Christopher		07/15/96	2000	Infusion Sys Spec
Boxer	Howard	A	09/04/90	1993	Infusion Sys Rep
McCaffrey	Timothy	M	07/10/89	1992	Infusion Sys Spec
Casey	Christopher	R	10/07/96	1997	Infusion Sys Rep
Dagle	Francis	L	05/14/90	1998	Infusion Sys Spec
Nachamkin	Sharon	C	01/06/92	2000	Infusion Sys Rep
Alberti	Mary	A	01/25/93	1993	Infusion Sys Rep
Bolt	Joanna	M	09/12/94	1996	Infusion Sys Rep
Godfrey	Mark	W	09/01/87	1992	Infusion Sys Spec
Mitchell	John	E	11/21/88	1992	Infusion Sys Spec
Connors	Robert	W	08/17/92	1994	Infusion Sys Rep
Austin-Marley	Kimberly	D	07/29/94	1999	Infusion Sys Spec
Flynn	Michael	K	05/03/93	1994	Infusion Sys Spec
Finkel	Christine	A	06/13/90	2001	Sr Account Exec
Avila	Graciela		04/05/93	1996	Infusion Sys Rep
Kummings	Melissa	J	06/25/90	1991	Infusion Sys Spec
Marks	Pamela	A	07/10/89	1991	Infusion Sys Rep
Cardozo	Jeffrey	L	06/15/87	1996	Infusion Sys Rep
Guzik	Ronald	J	07/06/92	1994	Infusion Sys Rep
Zitlow	David	P	02/17/92	1995	Infusion Sys Spec
Greenwood	Philip	L	06/05/89	1995	Infusion Sys Spec
May	Sherry	L	08/12/91	2001	Supv Ins Sls & Adm
French	Eric	T	01/20/97		Immunology Specialists
Love	Cornelius		06/08/92	1996	Infusion Sys Spec

Last Name	First Name	MI	Start Date	End Date	Final Job Title at Abbott
Lundy	Jeffrey	P	03/19/90	1997	Infusion Sys Spec
Collins	Thomas	J	11/05/97	1999	Infusion Sys Rep
McCrary	Martin	S	05/14/98	2000	Infusion Sys Rep
Valdez	Ricardo	B	01/13/97	1999	Infusion Sys Rep
Mentze	Laura	D	08/18/97		Immunology Specialist
Blakley	G. Lance		05/13/91	1993	Infusion Sys Rep
Blooston	James	A	12/30/96	1997	Infusion Sys Rep
Tiffany	Patrick	F	02/15/90	1991	Infusion Sys Rep
Edwards	Ethel	L	07/10/89	1993	Infusion Sys Rep
Theriot	Julia	S	02/19/90	2003	Nurse PTT
Coffin	Bruce	E	02/15/90	1991	Infusion Sys Spec
Naylor	Glen	G	02/15/90	1991	Infusion Sys Spec
Hauschild	James	L	09/03/91	1995	Infusion Sys Spec
Cooper-Siegel	Crystal	E	04/28/92	1996	Infusion Sys Spec
Nelson	Greg	A	02/01/89	1991	Infusion Sys Spec
Poljak	Sasha		03/15/93	1994	Infusion Sys Rep
Lloyd-Jones	Edward	G	04/02/90	1992	Infusion Sys Rep
Dillow	Monte	R	08/05/96		Regional Mgr
Ironside	John	S	06/01/87	1992	Infusion Sys Rep
Colon	Samuel	E	06/14/99	05/01/04	Major Acct Executive
Colon	Wilfredo		06/10/91	1992	Infusion Sys Rep
Tedeschi	John	E	09/07/98	2000	Infusion Sys Rep
Stark	Richard	A	11/02/81	2004	Dist Sls Mgr
Strasburg	Pete	C	04/16/61	1994	Sr Infsn Sys Spec
McReynolds	James	S	07/11/89	1994	Sr Infsn Sys Spec
Harsh	Harold	F	02/05/90	05/01/04	Account Mgr
Massaro	Angeline	C	09/13/93	05/01/04	Mgr Mktg – HPD
Renick	Anna Marie		01/06/88	05/01/04	Mgr Mktg – HPD
Flournoy	J. Edward		09/12/88	05/01/04	Sr Acct Mgr
Moran	John	M	01/23/84	05/01/04	Account Mgr

Last Name	First Name	MI	Start Date	End Date	Final Job Title at Abbott
Smith	Michelle	I	06/19/89	05/01/04	Pricing Specialist

Dated: December 19, 2007

Respectfully submitted,

ABBOTT LABORATORIES, INC.

By: /s/ Jason G. Winchester

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CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2007, a true and correct copy of the foregoing **DEFENDANT ABBOTT LABORATORIES, INC.'S SECOND AMENDED RESPONSES TO THE UNITED STATES' FIRST SET OF INTERROGATORIES** was served upon:

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